

ALEXANDER KUGELMAN (SBN 255463)
Kugelman Law, P.C.
21 Tamal Vista Blvd., Suite 202
Corte Madera, CA 94925
Telephone: (415) 968-1780
Facsimile: (415) 534-9441
alex@kugelmanlaw.com

Attorney for Claimant
ILIJA MATUSKO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Approximately 69,370 Bitcoin (BTC), Bitcoin
Gold (BTG), Bitcoin SV (BSV), and Bitcoin
Cash (BCH) seized from
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx,

Defendant.

ILIJA MATUSKO,

Claimant.

Case No. CV 20-7811 RS

**DECLARATION OF TOM
WESTERMANN IN SUPPORT OF
CLAIMANT ILIJA MATUSKO'S
RESPONSE TO UNITED STATES'
MOTION TO STRIKE VERIFIED CLAIM**

Date: September 30, 2021
Time: 1:30 pm
Ctmm: 3 (Via Zoom)

The Hon. Richard Seeborg

Trial Date: None Set

DECLARATION OF TOM WESTERMANN

I, TOM WESTERMANN, declare as follows:

1. I am a principal attorney at the law offices of Westermann-Scholl located at
Schomburgstraße 87, 22767 Hamburg and Anzengruberstraße 21, 12043 Berlin. I am a German

- 1 -

Case No. CV 20-7811-RS

**DECLARATION OF TOM WESTERMANN IN SUPPORT OF CLAIMANT ILIJA MATUSKO'S RESPONSE
TO UNITED STATES' MOTION TO STRIKE VERIFIED CLAIM**

1 citizen and licensed to practice law in Germany. This declaration is based on my own personal
2 knowledge. If called upon to testify, I could and would testify competently to the contents of this
3 declaration.


4 2. On or about January Ilija Matusko ("Mr. Matusko") contacted me to determine
5 whether I could assist him with a claim to recover 48 Bitcoin he deposited to his Silk Road account in
6 2011.

7 3. Around the same time, I began to research and contact attorneys to serve as U.S.-based
8 counsel.

9 4. On April 21, 2021, I first contacted Alex Kugelman at Kugelman Law, P.C. Mr.
10 Kugelman requested additional information to evaluate whether Ilija had a viable claim. I provided
11 additional information regarding Mr. Matusko's initial Bitcoin purchase and interaction with the Silk
12 Road marketplace.

13 5. I declare under the penalty of perjury under the laws of the United States and that the
14 foregoing is true and correct to the best of my knowledge and belief.

15 Executed this 26 day of August, 2021 in Hamburg, Germany.

16
17
18
19
20
21
22
23
24
25
26
27
28

Tom Westermann
Principal Attorney
Westermann-Scholl Rechtsanwälte
Schomburgstraße 87
22767 Hamburg, Germany

